

Exhibit 98

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

Name of the Account (94 accounts)	Account #	Deposits (SAR)	Withdrawals (SAR)	Time Period	Bates Range
Al Haramain Islamic Foundation	SA [Redacted] 7978	25,710.00	-	12/18/2002-12/29/2002	ARB-00010786-10787
Al Haramain Islamic Foundation's Warehouse in Al Awamer.	SA [Redacted] 6332	228,563.00	116,500.00	08/19/2001-12/25/2002	ARB-00010788-10793
Al Haramain Islamic Foundation - General Account	SA [Redacted] 9553	1,772,409.68	1,765,207.26	02/25/2001-12/31/2002	ARB-00010794-10816
Al Haramain Islamic Foundation	SA [Redacted] 1147	46,817,968.47	35,335,970.59	06/12/2000-12/31/2002	ARB-00010817-11148
Al Haramain Islamic Foundation	SA [Redacted] 5458	340,114.00	327,475.00	11/03/2001-12/31/2002	ARB-00011149-11174
Al Haramain Islamic Foundation - Internet	SA [Redacted] 8887	9,342,449.77	6,521,493.02	01/03/1998-12/28/2002	ARB-00011175-11282
Al Haramain Islamic Foundation - Women's Committee	SA [Redacted] 2001	7,082.00	7,082.00	10/22/2000-02/18/2001	ARB-00011283-11284
Al Haramain Islamic Foundation	SA [Redacted] 2422	1,920.00	-	12/04/2001-11/18/2002	ARB-00011285-11286
Al Haramain Islamic Foundation	SA [Redacted] 3936	60,810.00	60,000.00	06/06/2002-10/06/2002	ARB-00011287-11288
Al Haramain Islamic Foundation	SA [Redacted] 1416	393,054.00	388,083.00	01/16/2002-12/18/2002	ARB-00011289-11297
Al Haramain Islamic Foundation - Al Bukayriyah Branch	SA [Redacted] 5509	3,233,172.00	3,233,172.00	08/01/2001-12/12/2002	ARB-00011298-11333
Al Haramain Islamic Foundation - Jizan Office	SA [Redacted] 0105	989,753.00	798,918.00	04/21/2002-12/25/2002	ARB-00011334-11353
Al Haramain Islamic Foundation	SA [Redacted] 8019	48,208.00	48,208.00	06/06/2002-09/29/2002	ARB-00011354-11355
Al Haramain Islamic Foundation	SA [Redacted] 8001	2,205,873.00	1,765,767.00	11/21/2001-12/31/2002	ARB-00011356-11434
Al Haramain Islamic Foundation – Winning Trade.	SA [Redacted] 4012	263,740.00	195,650.00	12/04/2000-12/31/2002	ARB-00011435-11607
Al Haramain Islamic Foundation - Ongoing Charity	SA [Redacted] 2770	1,231,493.28	731.00	10/16/2001-12/29/2002	ARB-00011608-11666
Al Haramain Islamic Foundation	SA [Redacted] 6509	17,118,984.00	16,862,132.00	01/06/1998-12/31/2002	ARB-00011667-11728
Al Haramain Islamic Foundation	SA [Redacted] 0660	1,278,715.00	1,272,049.00	12/18/2000-12/31/2002	ARB-00011729-11787
Al Haramain Islamic Foundation	SA [Redacted] 8076	164,083.00	98,792.85	05/12/2002-12/31/2002	ARB-00011788-11797
Al Haramain Islamic Foundation	SA [Redacted] 6766	8,750.00	-	12/24/2002-12/24/2002	ARB-00011798-11799
Al Haramain Islamic Foundation	SA [Redacted] 3335	5,090,895.18	4,743,330.44	05/09/2000-12/30/2002	ARB-00011800-11862
Al Haramain Islamic Foundation	SA [Redacted] 3730	5,207.00	-	11/23/2002-12/17/2002	ARB-00011863-11864
Al Haramain Islamic Foundation - One Body	SA [Redacted] 1113	10,113,358.00	9,412,435.00	06/18/2000-12/28/2002	ARB-00011865-11959
Al Haramain Islamic Foundation	SA [Redacted] 8043	65,790.00	65,690.00	11/27/2001-08/21/2002	ARB-00011960-11961
Al Haramain Islamic Foundation in Al Dilam	SA [Redacted] 8201	1,110,044.00	1,081,845.00	04/08/2000-12/30/2002	ARB-00011962-11981
Al Haramain Islamic Foundation	SA [Redacted] 8068	278,500.00	243,000.00	06/19/2002-11/30/2002	ARB-00011982-11983
Al Haramain Islamic Foundation	SA [Redacted] 8788	55,300.00	50,000.00	11/09/2002-12/15/2002	ARB-00011984-11988
Al Haramain Islamic Foundation	SA [Redacted] 8050	178,774.00	165,709.00	05/28/2002-12/31/2002	ARB-00011989-12002
Al Haramain Islamic Foundation	SA [Redacted] 7870	55,050.00	55,050.00	11/24/2002-12/25/2002	ARB-00012003-12006
Al Haramain Islamic Foundation in Al Rass - Zakat	SA [Redacted] 0607	1,415,381.81	1,382,854.00	08/28/2000-12/28/2002	ARB-00012011-12031
Al Haramain Islamic Foundation in Al Rass	SA [Redacted] 0084	5,865,694.00	5,865,664.00	11/11/2000-12/11/2002	ARB-00012032-12092
Al Haramain Islamic Foundation	SA [Redacted] 9990	-	-	Not Dated	ARB-00012093-12094
Al Haramain Islamic Foundation - Al Haramain Doctors Comm.	SA [Redacted] 0701	1,582,923.00	1,025,088.00	05/19/2001-12/31/2002	ARB-00012103-12133
Al Haramain Islamic Foundation	SA [Redacted] 2724	-	-	Not Dated	ARB-00012134-12135
Al Haramain Islamic Foundation	SA [Redacted] 2010	4,325,692.50	4,113,380.47	03/14/2000-12/31/2002	ARB-00012137-13052
Al Haramain Islamic Foundation - Establishment	SA [redacted] 2101	300.00	300.00	10/25/2000-11/08/2001	ARB-00013057-13058
Al Haramain Islamic Foundation - Endowment Account	SA [Redacted] 7002	4,487,239.19	1,126,000.00	07/15/2001-12/28/2002	ARB-00013302-13328
Al-Haramain Foundation/Jeddah	SA [redacted] 7763	14,807,294.00	13,586,052.45	07/29/1998-12/31/2002	ARB-00013814-13850
Al-Haramain Foundation/Riyadh	SA [redacted] 9096	55,429,192.76	55,729,770.64	01/01/1998-12/24/2002	ARB-00014582-14879
Al-Haramain Foundation/Riyadh	SA [redacted] 2922	102,612,462.61	102,681,114.99	01/01/1998-12/31/2002	ARB-00014880-15794
Al-Haramain Foundation/Jeddah	SA [redacted] 1716	8,901,790.00	8,941,793.62	01/03/1998-12/31/2002	ARB-00015795-15898
Al-Haramain Foundation/Buraidah	SA [redacted] 4004	495,907.00	456,086.00	11/27/2000-12/29/2002	ARB-00015899-16118
Al-Haramain Foundation/Riyadh	SA [redacted] 8986	67,600,478.35	62,188,619.45	01/01/1998-12/30/2002	ARB-00016119-16569
Al-Haramain Foundation/charitable trust/Jeddah	SA [redacted] 3332	3,639,308.65	169,720.00	10/17/2001-12/30/2002	ARB-00016570-16665
Al-Haramain Foundation/Al Ras/Riyadh	SA [redacted] 0509	2,108,404.00	2,032,427.00	08/28/2000-12/31/2002	ARB-00016666-17317
Al-Haramain Foundation/Profitable Trade/Riyadh	SA [redacted] 7772	14,486,933.80	12,974,750.98	12/05/1999-12/31/2002	ARB-00017581-23304

Name of the Account (94 accounts)	Account #	Deposits (SAR)	Withdrawals (SAR)	Time Period	Bates Range
Al-Haramain Foundation/Riyadh	SA [redacted] 4446	14,109,858.83	14,021,771.06	08/18/1998-12/30/2002	ARB-00028868-29098
Foundation of [redacted]/Buraidah	SA [redacted] 2051	500.00	500.00	11/30/2000-11/07/2001	ARB-00029099-29100
Foundation of [redacted]/Buraidah	SA [redacted] 2069	13,009.00	13,009.00	03/25/2000-11/07/2001	ARB-00029101-29102
Foundation of [redacted]/Buraidah	SA [redacted] 2077	9,947.00	9,947.00	06/12/2000-11/07/2001	ARB-00029103-29104
Foundation of [redacted]/Buraidah	SA [redacted] 2036	41,286.00	41,286.00	05/02/2001-01/02/2002	ARB-00029105-29106
Foundation of [redacted]/Buraidah	SA [redacted] 2044	89,032.00	89,032.00	03/25/2000-11/07/2001	ARB-00029107-29109
Foundation of [redacted]/Buraidah	SA [redacted] 2093	900.00	900.00	03/13/2000-11/08/2001	ARB-00029110-29111
Al-Haramain Foundation/Yanbu	SA [redacted] 5500	2,148,743.78	2,134,942.28	12/25/1999-12/30/2002	ARB-00029112-29180
Al-Haramain Foundation/Taif	SA [redacted] 2005	3,296,684.00	2,713,356.92	06/14/1998-12/30/2002	ARB-00029181-29239
Al-Haramain Foundation/Riyadh	SA [redacted] 5858	16,318.22	-	11/10/2002-12/31/2002	ARB-00029240-29244
Al-Haramain Foundation/Tabuk Branch	SA [redacted] 0005	1,496,842.00	1,315,935.88	11/04/1999-12/30/2002	ARB-00029245-29281
Al-Haramain Foundation/Riyadh	SA [redacted] 4220	262,057.00	261,557.00	10/30/2001-12/25/2002	ARB-00029282-29288
Al-Haramain Foundation/Jeddah	SA [redacted] 6400	3,751,430.00	3,748,242.00	09/10/2000-12/29/2002	ARB-00029289-29306
Al-Haramain Foundation/Riyadh	SA [redacted] 8100	430,979.00	395,796.00	11/25/2001-12/31/2002	ARB-00029307-29418
Al-Haramain Foundation/Al Bukayriyah	SA [redacted] 9777	240,430.00	240,430.00	05/30/2001-12/03/2002	ARB-00029419-29426
Al-Haramain Foundation/Riyadh	SA [redacted] 2887	402,436.00	292,510.00	01/12/2002-12/31/2002	ARB-00029427-29492
Al-Haramain Foundation/Riyadh	SA [redacted] 1238	37,970,739.07	29,089,707.00	03/10/2001-12/31/2002	ARB-00029493-29672
Al-Haramain Foundation/Riyadh	SA [redacted] 2822	1,020,993.60	-	11/20/2002-12/28/2002	ARB-00029673-29687
Al-Haramain Foundation/Yanbu Industrial City	SA [redacted] 1607	254,847.90	251,247.90	10/09/2000-12/31/2002	ARB-00029688-29713
Al-Haramain Foundation/Riyadh	SA [redacted] 1472	32,474,420.50	33,477,023.74	01/01/1998-12/03/2002	ARB-00029714-29937
Al-Haramain Foundation/Riyadh	SA [redacted] 3334	79,670,492.98	79,534,553.05	01/01/1998-12/31/2002	ARB-00029938-30389
Al-Haramain Foundation/Zakat Account/Al Bukayriyah	SA [redacted] 5004	77,179.10	77,179.00	11/17/2001-12/03/2002	ARB-00030390-30392
Al-Haramain Foundation/Riyadh	SA [redacted] 8035	232,348.00	207,508.00	02/16/2002-12/11/2002	ARB-00030393-30397
Al-Haramain Foundation/Dammam Office	SA [redacted] 7770	4,850,950.97	4,759,656.00	06/20/2001-12/30/2002	ARB-00030398-30450
Al-Haramain Foundation Donation Depository/Riyadh	SA [redacted] 6340	38,650.00	31,300.00	11/28/2001-12/29/2002	ARB-00030451-30453
Al-Haramain Foundation/Riyadh	SA [redacted] 8895	330,829,536.85	315,383,007.44	01/03/1998-12/31/2002	ARB-00030454-31552
Al-Haramain Foundation/Riyadh	SA [redacted] 6962	98,712.00	63,669.00	06/10/2002-12/21/2002	ARB-00031553-31570
Al-Haramain Foundation/[redacted] Yanbu	SA [redacted] 0906	70,839.00	70,839.00	10/01/2000-08/02/2001	ARB-00031571-31574
Al-Haramain Foundation/Riyadh	SA [redacted] 7113	14,119,656.00	13,503,343.90	10/07/2001-12/31/2002	ARB-00031575-31846
Al-Haramain Foundation/Riyadh	SA [redacted] 9909	959,534.00	959,534.00	11/02/1999-03/03/2002	ARB-00031847-31862
Al-Haramain Foundation/Riyadh	SA [redacted] 8092	120,797.00	31,758.00	04/29/2002-12/31/2002	ARB-00031863-31866
Al-Haramain Foundation/Riyadh	SA [redacted] 5119	150,574.00	139,913.00	12/13/2001-12/31/2002	ARB-00031867-31889
Al-Haramain Foundation/Riyadh	SA [redacted] 5559	119,799,139.24	118,106,046.81	01/01/1998-12/31/2002	ARB-00031890-32721
Al-Haramain Foundation/Unaizah Office/Unaizah	SA [redacted] 2664	4,502,798.00	4,489,496.96	05/13/2001-12/31/2002	ARB-00032722-32835
Al-Haramain Foundation/Riyadh	SA [redacted] 2994	656,233.00	561,844.00	11/05/2001-12/31/2002	ARB-00032836-32962
Al-Haramain Foundation/Riyadh	SA [redacted] 0727	3,112,942.82	2,729,697.94	05/27/2001-12/30/2002	ARB-00032963-33054
Al-Haramain Foundation/Unaizah Office/Unaizah	SA [redacted] 3332	36,350.00	14,700.00	07/23/2001-12/30/2002	ARB-00033055-33071
Al-Haramain Foundation/Riyadh	SA [redacted] 8027	64,050.00	53,800.00	07/04/2002-12/28/2002	ARB-00033072-33076
Al-Haramain Foundation/Riyadh	SA [redacted] 6667	736,258,404.53	713,697,625.75	01/01/1998-12/31/2002	ARB-00033077-33710
Al-Haramain Foundation/Riyadh	SA [redacted] 7470	385,087.00	268,355.00	01/16/2002-12/29/2002	ARB-00033711-33796
Al-Haramain Foundation/Riyadh	SA [redacted] 9096	55,429,192.76	55,729,770.64	01/01/1998-12/24/2002	ARB-00033797-34094
Al-Haramain Foundation/Riyadh	SA [redacted] 9090	87,525,167.06	74,463,812.88	06/12/2000-12/31/2002	ARB-00034095-34430
Al-Haramain Foundation/Jeddah	SA [redacted] 0007	28,609,378.72	27,852,311.45	01/04/1998-12/31/2002	ARB-00034431-34698
Al-Haramain Foundation/Medina	SA [redacted] 9008	8,647,448.75	8,572,836.76	12/23/2000-12/30/2002	ARB-00034699-35163
Al-Haramain Foundation/Riyadh	SA [redacted] 8804	43,001,469.52	35,825,643.32	01/01/1998-12/31/2002	ARB-00035164-35787
Al-Haramain Foundation/Profitable Trade/Al Bukayriyah	SA [redacted] 9660	415,902.21	380,016.00	02/28/2001-12/31/2002	ARB-00035788-35985

Name of the Account (94 accounts)	Account #	Deposits (SAR)	Withdrawals (SAR)	Time Period	Bates Range
Al-Haramain Foundation/Riyadh	SA [redacted] 1006	26,755,074.64	24,638,951.00	12/13/2000-12/31/2002	ARB-00035986-36207
Al-Haramain Foundation/Riyadh	SA [redacted] 6003	111,425,151.68	107,962,484.54	01/03/1998-12/31/2002	ARB-00036208-37173
Totals		2,146,119,285.78	2,035,094,758.98		